

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

L. Lin Wood, Jr.,

Plaintiff,

v.

Brad Raffensperger, in his official capacity  
as Secretary of the State of Georgia, et al.,

Defendants.

CIVIL ACTION FILE NO.  
20-cv-04651-SDG

**AFFIDAVIT OF KIMBERLY BRANDON**

Personally appeared before me, the undersigned subscribing officer, duly authorized to administer oaths, Kimberly Brandon, who being duly sworn, deposed and stated as follows:

1. My name is Kimberly Brandon. I am over 18 years of age, a citizen of the State of Georgia, suffer from no legal disabilities, and am otherwise competent to testify to the matters contained herein. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.

2. I am a resident of and registered elector in Cobb County, Georgia.

3. I volunteered to work as the Democratic site volunteer supervisor for Cobb County, Georgia on November 13 through 15 of 2020, and was present on all

three days as a monitor credentialed by the Democratic Party of Georgia to observe the statewide hand recount of ballots cast in the 2020 Presidential Election in Cobb County, Georgia (the “Recount”).

4. I arrived at the Event Center in Jim R. Miller Park, in Marietta, Georgia, where the Recount was held each day I worked as a volunteer supervisor at around 1:00 p.m. My assigned shift on each day I volunteered was from 1:00 p.m. until 6:00 p.m.

5. I did not witness or otherwise observe any Cobb County election official or officials treat credentialed monitors for the Republican Party any differently than the way they treated credentialed monitors for the Democratic Party.

6. I did not witness or otherwise observe any Cobb County election official or officials treat any credentialed monitors, regardless of party affiliation, with any hostility.

7. I did not witness Cobb County Director of Elections Janine Eveler treating monitors or public observers any differently based upon their party affiliation.

8. I did not witness Director Eveler treating anyone with hostility or behaving in any way that was less than professional.

9. Instead, at least based on what I observed, Director Eveler appeared to respond promptly to all inquiries, complaints, and questions from monitors and observers regardless of their party affiliation. On Saturday, another election official was supervising, and she also seemed to treat everyone fairly based on what I observed.

10. I understand that an individual who claims to have observed the recount in Cobb County on Monday, November 16, 2020, has submitted that the process was “sloppy, unorganized, and suspicious.” However, I consider myself to be highly organized and particular and, based on what I saw, nothing could be further from the truth.

11. This is not to say that everything was constantly perfect. To be sure, election officials had to hand count almost 400,000 ballots in Cobb County alone, and invariably humans will make occasional mistakes. However, whenever anyone reported any concern or mistake to Director Eveler, it was my observation that any such issue was promptly, efficiently, and thoroughly addressed.

12. In addition, it was my observation that Director Eveler, or other elections officials, were constantly available to questions and concerns.

13. On several occasions, I did witness Republican observers standing closer to the audit tables than is recommended under Centers for Disease Control

guidelines as a result of the COVID-19 pandemic. During the first day or two of the Recount this was reported to Director Eveler and promptly addressed by her. It was clear to me that the Republican monitors wanted to be close enough to read each ballot, which is more difficult from the necessary distance of six feet.

14. I did continue to escalate concerns when I observed Republican credentialed monitors attempting to talk to or engage with the auditors, as this clearly violated the rules that were explained to us.

15. I understand that an individual has submitted an affidavit to this Court alleging that certain ballots looked and felt different. While I touched no ballots personally, in accordance with the rules, I saw many ballots that were cast on election day and marked by Ballot Marking Devices (“BMDs”) and absentee ballots during the three days that I volunteered as a monitor. The BMD ballots from election day do look different than absentee ballots. Absentee ballots are creased from mailing and longer in size, and the BMD ballots generated by the in-person voting machines are not creased, shorter, and list the name of the selected candidate, rather than indicating the voter’s choice with a marked bubble next to the name of the selected candidate in a list of all candidates.

16. I understand that certain individuals have submitted affidavits to this Court claiming they observed irregularities in Cobb County during the Recount

without providing further evidence of same. Notably, however, I witnessed credentialed Republican monitors constantly taking video recordings and photographs on their phone. Indeed, at one point a Republican credentialed monitor took a video recording of me and my volunteer monitors where we were standing and sitting outside of the counting area for what felt like ten minutes. We simply ignored her and continued doing what we were there to do: observe the Recount. However, if these individuals have credible allegations of irregularities or improprieties having occurred, it would shock me that they would not have captured any such occurrences on camera.

17. Each day I was present, there were at least ten monitors from each political party present. At no point did I observe Republican monitors being denied access or otherwise turned away.

18. To the extent any minor problems arose, I observed election officials promptly address and rectify such issues with the audit teams directly. In general, the process ran smoothly, everyone was treated fairly, and election officials were working hard to complete the enormous task of hand counting hundreds of thousands of ballots, under the watchful eye of tens of credentialed observers and more that remained in the public viewing area, before the Recount deadline.

19. I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.

20. I declare under penalty of perjury that the foregoing is true and correct to the best of my ability.

Executed this 18th day of November 2020.

Kimberly Brandon (signed)

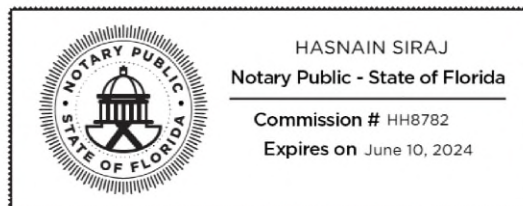
Kimberly Brandon

State of Florida, County of Duval

Sworn to and subscribed to  
before me this 18th day of  
November 2020. Type of identification presented is driver license.

Hasnain Siraj

Notary Public Hasnain Siraj



My commission expires: 06/10/2024      Notarized online using audio-video communication